

IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION

CAPITAL PRIDE ALLIANCE, INC.,

Nick Harrison
Attorney for the Plaintiff
(DC Bar #1024439)
Harrison-Stein, PC
601 Pennsylvania Avenue NW
South Building, Suite 900
Washington, DC 20005-3647
Office: (202) 434-8292
Cell: (202) 297-5057
nick@harrison-stein.com
<https://www.harrison-stein.com/>

Plaintiff,

v.

DARREN DOLSHAD PASHA,

1711 Massachusetts Avenue NW
Apt 509
Washington, DC 20036-9849
Cell: (703) 343-3524
darrendpasha@outlook.com

Defendant.

Case No. 2025-CAB-007162

CIVIL COMPLAINT

COMES NOW, the Plaintiff, Capital Pride Alliance, Inc., to allege and state as follows:

JURISDICTION AND VENUE

1. This Court possesses subject matter jurisdiction over this civil protection action pursuant to D.C. Code § 11-921 and § 16-1061 et seq.
2. Venue is proper in the District of Columbia as the alleged conduct occurred within this jurisdiction, and both the Plaintiff and the Defendant are located in the District of Columbia.
3. Plaintiff, Captial Pride Alliance, Inc., is a non-profit corporation organized under the laws of the District of Columbia, with its primary office located in the District of Columbia.
4. Defendant, Darren Dolshad Pasha, is an individual residing in the District of Columbia.

STATEMENT OF FACTS

5. Defendant engaged in a sustained course of conduct over the past year involving repeated and unwanted attention, harassment, and contact directed at staff, board members, and volunteers of Capital Pride Alliance, Inc. This conduct satisfies the “course of conduct” requirement for stalking under D.C. Code § 22-3133, as it caused fear, serious alarm, and emotional distress to multiple agents of the organization.
6. In June 2024, Defendant initiated an unwanted campaign of intrusive pursuit, targeting CPA Board President Ashley Smith immediately after meeting him. This included excessive digital communication, demands for personal meetings, and attempts to solicit legal assistance, all while falsely implying he had influential connections to coerce access to events.
7. In December 2024, Defendant demanded complimentary tickets for a CPA New Year’s Eve event. When denied by staff, he gained unauthorized, free entry by deception, falsely claiming to be a volunteer. He subsequently stalked and repeatedly harassed the volunteer/staff member who initially refused him access at numerous unrelated events.

8. In January 2025, at a volunteer mixer, Defendant cornered a CPA staff member, invaded her personal space, criticized the event's coordination, and committed unwanted physical contact by tightly grabbing her hand, constituting professional intimidation and physical harassment.
9. In March 2025, during an HRC National Dinner kickoff, Defendant's behavior was observed to be disruptive, involving repeatedly crossing physical boundaries. An HRC Board Member explicitly noted that Defendant "us[ed] his physical size to attempt to intimidate people."
10. In April 2025, Defendant discovered and harassed attendees via intense, threatening text messages at a private joint CPA/HRC fundraiser, resulting in a formal, institutional ban from all Human Rights Campaign events due to his aggressive behavior.
11. On April 10, 2025, immediately following a criminal charge for an Anti-Stalking Order violation in an unrelated matter, Defendant contacted a CPA staff member, sending intensely personal details of his detention, jail time, and mental hospital stay, framing himself as a victim and demanding intimate emotional engagement.
12. In May 2025, Defendant retaliated against a CPA volunteer by falsely accusing him of sexual harassment and threatening him via email for "libel, slander, and deformation," demonstrating a pattern of weaponizing systems in response to social or institutional rejection.
13. In June 2025, Defendant was convicted on multiple counts of violating existing Anti-Stalking Orders in matters unrelated to CPA, with consecutive sentences imposed, establishing a pattern of contempt for judicial restraint.

14. On July 18, 2025, Defendant defied a formal Cease-and-Desist Order issued by CPA's Outside General Counsel by using a proxy—his purported cousin, Derek Aziz Pasha—to initiate contact and threaten multi-party litigation against CPA affiliates and vendors.
15. On August 19, 2025, Defendant sent a formal legal demand letter offering to settle all pending disputes only upon his “immediate appointment to the Capital Pride Alliance Board of Directors as a corrective and restorative measure,” confirming his intent to leverage harassment and coercion to obtain institutional power and unrestricted access to Plaintiff's personnel.
16. Defendant has engaged in numerous other acts of harassment, boundary violations, and intimidation not specifically enumerated herein, which have caused staff, board members, and volunteers of Capital Pride Alliance, Inc. to experience fear, serious alarm, and emotional distress. These additional incidents are set forth in greater detail in the concurrently filed Legal Memorandum in Support, which is hereby incorporated by reference pursuant to Superior Court Civil Rule 10(c).

CAUSE OF ACTION

17. Plaintiff Capital Pride Alliance, Inc. (“CPA”) brings this cause of action for civil stalking under D.C. Code §§ 22-3133 and 16-1062.
18. D.C. Code § 22-3133 prohibits any person from engaging in a course of conduct directed at another person that would cause a reasonable person in the target's circumstances to:
 - (A) Fear for his or her safety or the safety of another person;
 - (B) Feel seriously alarmed, disturbed, or frightened; or
 - (C) Suffer emotional distress.

19. D.C. Code § 16-1062 authorizes this Court to issue a Civil Protection Order when such stalking conduct has occurred and is likely to continue.
20. Over the past year, Defendant Darren Dolshad Pasha (“DDP”) has engaged in a sustained and escalating course of conduct directed at CPA, including repeated and unwanted contact, harassment, intimidation, threats, manipulation, and coercive behavior targeting CPA staff, board members, volunteers, and affiliates.
21. This conduct included physical intimidation, unwanted physical contact, deception to gain unauthorized access to events, retaliatory threats, abusive digital communications, proxy-based harassment, and knowing defiance of organizational bans and protective orders.
22. Defendant has also been convicted on multiple counts for violating Anti-Stalking Orders in unrelated matters during the same time period, confirming his knowledge of the wrongful nature of his conduct.
23. Defendant knew or should have known that his actions would cause reasonable persons affiliated with CPA to fear for their safety, feel seriously alarmed or disturbed, and suffer emotional distress.
24. Defendant’s conduct in fact caused multiple CPA agents to experience psychological distress and fear, and to alter their professional and social behavior to avoid contact with him.
25. CPA has suffered actual harm, including disruption to its operations, institutional risk, and harm to the wellbeing and safety of its personnel.
26. Plaintiff is entitled to a Civil Protection Order pursuant to D.C. Code § 16-1062, enjoining Defendant from further contact, harassment, or interference with CPA and those affiliated with it.

PRAYER FOR RELIEF

27. Plaintiff, Capital Pride Alliance, Inc., respectfully requests that this Court enter judgment against Defendant DARREN DOLSHAD PASHA and grant the following relief:

- (A) A Permanent Civil Anti-Stalking Order against the Defendant pursuant to D.C. Code §§ 16-1061 et seq. and 16-1064.
- (B) Permanent Stay-Away Orders prohibiting the Defendant from approaching, following, monitoring, placing under surveillance, or attempting to communicate with all current and future staff, board members, and volunteers of Capital Pride Alliance, Inc.
- (C) Permanent Stay-Away Orders prohibiting the Defendant from coming within 200 yards of all Capital Pride Alliance offices (current and future), events, venues, associated activities, and any location where CPA staff, board members, or volunteers are known to work.
- (D) Permanent Non-Contact Orders prohibiting the Defendant from contacting the protected individuals by telephone, in writing, via electronic or social media, or in any other manner, directly or indirectly through any third party or proxy.
- (E) Such other and further relief as the Court deems just and equitable.

RESPECTFULLY SUBMITTED BY:

Nick Harrison

NICK HARRISON, JD, MBA, PMP

Attorney for the Plaintiff

(DC Bar #1024439)

Harrison-Stein, PC

601 Pennsylvania Avenue NW

South Building, Suite 900

Washington, DC 20005-3647

Office: (202) 434-8292

Cell: (202) 297-5057

nick@harrison-stein.com

<https://www.harrison-stein.com/>